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Begin forwarded message:

From: "Rhodes, Dennis J." <Dennis.Rhodes@wilsonelser.com>
Date: September 5, 2018 at 4:01:55 PM CDT
To: Joseph Messer <jmesser@messerstrickler.com>
Cc: "Podesta, John" <John.Podesta@wilsonelser.com>, "Lee, Socorro" <Socorro.Lee@wilsonelser.com>, Kevin Borozan <kborozan@messerstrickler.com>, "Lee, Socorro" <Socorro.Lee@wilsonelser.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Hi Joe,

Still waiting to discuss with David Bailey. Our schedules have not meshed since Monday's holiday. I will let you know as soon as speak with him.

Dennis

Dennis J. Rhodes
Attorney at Law
Wilson Elser Moskowitz Edelman & Dicker LLP
525 Market Street - 17th Floor
San Francisco, CA 94105-2725
415.625.9295 (Direct)
415.433.0990 (Main)
415.434.1370 (Fax)
dennis.rhodes@wilsonelser.com



From: Joseph Messer [mailto:jmesser@messerstrickler.com]
Sent: Wednesday, September 05, 2018 1:50 PM
To: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Lee, Socorro <Socorro.Lee@wilsonelser.com>; Kevin Borozan <kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Dennis –

I take it that we will have to go forward with the motion to compel.
Please let me know if that's not the case.

Joseph S. Messer, Esq.
Messer Strickler, Ltd.
a Professional Corporation
225 W. Washington, Suite 575
Chicago, IL 60606
312-334-3440 Phone
312-334-3473 Fax

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From: Joseph Messer
Sent: Tuesday, September 4, 2018 3:49 PM
To: 'Rhodes, Dennis J.' <Dennis.Rhodes@wilsonelser.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Lee, Socorro <Socorro.Lee@wilsonelser.com>; Kevin Borozan <kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Thank you.

From: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Sent: Tuesday, September 4, 2018 2:53 PM

Mail - afullett@messerstrickler.com

Page 9 of 49

To: Joseph Messer <jmesser@messerstrickler.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Lee, Socorro <Socorro.Lee@wilsonelser.com>; Kevin Borozan <kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Joe,

We will get back to you tomorrow morning regarding the deposition issue.

Thanks,
Dennis

Dennis J. Rhodes
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Wilson Elser Moskowitz Edelman & Dicker LLP
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<image001.jpg>

From: Joseph Messer [mailto:jmesser@messerstrickler.com]
Sent: Tuesday, September 04, 2018 12:18 PM
To: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>; Kevin Borozan <kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Dennis –

Per my voicemail to you of just now please confirm that your client is in agreement to the following topics and let me know some dates that work for his deposition. Otherwise I will have no alternative but to file the motion to compel.

Thanks.

Joseph S. Messer, Esq.
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From: Joseph Messer
Sent: Thursday, August 30, 2018 4:09 PM
To: 'Rhodes, Dennis J.' <Dennis.Rhodes@wilsonelser.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>; Kevin Boroza <kboroza@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Dennis –

Plaintiff will agree to narrow the deposition topics to the following:

1. How RMB came to be Equifax's processing agent for orders for prescreen lists made or purportedly made by or on behalf of Geneva Motors, Inc. d/b/a Geneva Motors ("Geneva Motors") and the process that RMB went through to become Equifax's processing agent.
2. The processes through which RMB received and filled orders for prescreen lists made by or on behalf of Geneva Motors including the identity of the persons and entities who placed those orders.
3. Communications by and between representatives of RMB, Geneva Motors and/or Equifax regarding the forgoing matters.
4. The circumstances and communications regarding Equifax's February 24, 2017 direction that RMB suspend prescreen and other FCRA information services to Geneva Motors on February 24, 2017.
5. Communications by David Bailey or other RMB representatives with representatives of Equifax regarding the forgoing suspension of

services as well as any investigation by Equifax into the allegations in Plaintiff's complaint, and any actions taken by Mr. Bailey and/or any other representatives of RMB in connection with the investigation.

6. The outcome of the forgoing investigation (assuming said investigation in fact occurred).

7. Communications by David Bailey or other RMB representatives with representatives of Geneva Motors (including but not limited to Robert McGinley and John McGinley) regarding the forgoing suspension of services and since the date of the forgoing suspension of services.

8. Services by RMB to Geneva Motors or any successor entity or entities to Geneva Motors, or to Robert McGinley and/or John McGinley or to other entities through which Robert McGinley and/or John McGinley have procured prescreen lists since Equifax's suspension of services to Geneva Motors on or about February 24, 2017.

Please let me know if we are in agreement and some dates that work for your client for the deposition.

Thanks and I look forward to hearing back from you soon.

Joseph S. Messer, Esq.

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From: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>

Sent: Thursday, August 30, 2018 11:58 AM

Mail - afullett@messerstrickler.com

Page 12 of 49

To: Joseph Messer <jmesser@messerstrickler.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee
<Marilee.Barlow@wilsonelser.com>; Kevin Borozan
<kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Thanks, Joe.

Dennis J. Rhodes
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<image005.jpg>

From: Joseph Messer [mailto:jmesser@messerstrickler.com]
Sent: Thursday, August 30, 2018 9:39 AM
To: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee
<Marilee.Barlow@wilsonelser.com>; Kevin Borozan
<kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Dennis –

I will review the topics and get back to you on it.

Joseph S. Messer, Esq.
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From: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Sent: Thursday, August 30, 2018 11:05 AM
To: Joseph Messer <jmesser@messerstrickler.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>; Kevin Borozan <kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Joe,

Thanks for speaking about this matter with me on Tuesday. I am following up with Mr. Bailey, accordingly. As we discussed, plaintiff is willing to significantly narrow the scope of topics in a 30(b)(6) deposition of RMB. While we have not determined whether we will oppose a deposition, it would help if you provided a revised scope of the categories the areas of questioning.

Thanks,
Dennis

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dennis.rhodes@wilsonelser.com

<image005.jpg>

From: Joseph Messer [<mailto:jmesser@messerstrickler.com>]
Sent: Tuesday, August 28, 2018 9:34 AM
To: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>; Kevin Borozan <kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Mail - afullett@messerstrickler.com

Page 14 of 49

OK. Talk then.

From: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Sent: Tuesday, August 28, 2018 11:32 AM
To: Joseph Messer <jmesser@messerstrickler.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>; Kevin Boroza <kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Joe,

Let's talk at noon pacific. I realized I have another call at 10 this morning.

Thanks,
Dennis

Dennis J. Rhodes
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dennis.rhodes@wilsonelser.com

<image005.jpg>

From: Joseph Messer [<mailto:jmesser@messerstrickler.com>]
Sent: Monday, August 27, 2018 3:07 PM
To: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>; Kevin Boroza <kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Dennis –

Is that 10:00am PST tomorrow? If so I'm available.

From: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Sent: Thursday, August 23, 2018 11:55 AM
To: Joseph Messer <jmesser@messerstrickler.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee

Mail - afullett@messerstrickler.com

Page 15 of 49

<Marilee.Barlow@wilsonelser.com>; Kevin Borozan
<kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Joe,

I am on vacation through the end of the week. Let's set up a time to discuss on Tuesday. I am available at 10 am 8/28

Dennis J. Rhodes
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dennis.rhodes@wilsonelser.com

<image005.jpg>

From: Joseph Messer [<mailto:jmesser@messerstrickler.com>]
Sent: Thursday, August 23, 2018 8:17 AM
To: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>; Kevin Borozan <kborozan@messerstrickler.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Dennis –

Please let me know when you are available for a call to meet and confer on the attached motion. Hopefully we can work something out so I don't have to file it.

Thanks.

Joseph S. Messer, Esq.
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From: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Sent: Monday, August 20, 2018 5:43 PM
To: Joseph Messer <jmesser@messerstrickler.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Hi Joe,

Let's discuss further when you have a moment. I have family visiting but am back in the office on Thursday.

Thanks,
Dennis

Dennis J. Rhodes
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dennis.rhodes@wilsonelser.com

<image005.jpg>

From: Joseph Messer [<mailto:jmesser@messerstrickler.com>]
Sent: Friday, August 10, 2018 8:19 AM
To: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>
Subject: Re: Bruno, et al v. Equifax Information Services

Dennis -

I apologize for the delay in responding to your below email. I was heading out on vacation when we tried to connect via phone and haven't had a chance to catch up with emails until now.

For the reasons I have explained in the past, what you have proposed is not sufficient. We need and are entitled to correspondence and documents dating up and through RMB's termination of business with Geneva Financial Services and Equifax. Also, we are going to need to conduct the deposition or RMB's Rule 30(b)(6) deponent. Please let me know if RMB will reconsider its objections to Plaintiff's subpoenas.

Thanks and I look forward to hearing back from you soon.

Joseph S. Messer, Esq.
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From: Rhodes, Dennis J. <Dennis.Rhodes@wilsonelser.com>
Sent: Friday, August 3, 2018 11:41:48 AM
To: Joseph Messer
Cc: Podesta, John; Barlow, Marilee
Subject: RE: Bruno, et al v. Equifax Information Services

Hi Joe,

We've been missing each other over the last few days. Therefore, I wanted to email. As you know, RMB set forth its position relating to the

document subpoena and the deposition of David Bailey in our letter to you dated June 15, 2018. Those position remains the same. However, in an effort resolve all of the issues, RMB is willing to produce its communications with Equifax and Geneva that relate to this action through February 14, 2017, the date defining the class in plaintiff's complaint. In exchange, we ask that plaintiff withdraw the deposition notice and subpoena for Mr. Bailey. Please advise if this is agreeable to you.

Sincerely,
Dennis Rhodes

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<image006.jpg>

From: Joseph Messer [<mailto:jmesser@messerstrickler.com>]
Sent: Wednesday, August 01, 2018 2:20 PM
To: Rhodes, Dennis J.
Subject: RE: Bruno, et al v. Equifax Information Services

Since it will be tomorrow morning, please call me on my cell phone at 312 446-3693.

Thanks.

From: Rhodes, Dennis J. [<mailto:Dennis.Rhodes@wilsonelser.com>]
Sent: Wednesday, August 1, 2018 4:16 PM
To: Joseph Messer <jmesser@messerstrickler.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Kevin Borozan <kborozan@messerstrickler.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Hi Joe,

Sorry not to have gotten to you earlier. I am out of the office today, but will call first thing in the morning. Apologies for having to put the call off until then.

Thanks,
Dennis

Dennis J. Rhodes
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<image006.jpg>

From: Joseph Messer [<mailto:jmesser@messerstrickler.com>]
Sent: Wednesday, August 01, 2018 2:15 PM
To: Rhodes, Dennis J.
Cc: Podesta, John; Kevin Borozan; Barlow, Marilee
Subject: RE: Bruno, et al v. Equifax Information Services

Dennis –

I just left you a message. Please give me a call at my below number.

Thanks.

Joseph S. Messer, Esq.
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From: Rhodes, Dennis J. [mailto:Dennis.Rhodes@wilsonelser.com]
Sent: Tuesday, July 31, 2018 4:48 PM
To: Joseph Messer <jmesser@messerstrickler.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Kevin Borozan <kborozan@messerstrickler.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Yes.

Dennis J. Rhodes
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<image007.jpg>

From: Joseph Messer [mailto:jmesser@messerstrickler.com]
Sent: Tuesday, July 31, 2018 2:47 PM
To: Rhodes, Dennis J.
Cc: Podesta, John; Kevin Borozan; Barlow, Marilee
Subject: Re: Bruno, et al v. Equifax Information Services

I need to leave the office. Are you available to talk tomorrow afternoon?

Joseph Messer
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On Jul 31, 2018, at 4:33 PM, Rhodes, Dennis J.
<Dennis.Rhodes@wilsonelser.com> wrote:

Will call in 30 minutes to an hour or so. I have a filing I am handling.

Dennis J. Rhodes
Attorney at Law
Wilson Elser Moskowitz Edelman & Dicker LLP
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415.433.0990 (Main)
415.434.1370 (Fax)
dennis.rhodes@wilsonelser.com

<image001.jpg>

From: Joseph Messer
[<mailto:jmesser@messerstrickler.com>]
Sent: Tuesday, July 31, 2018 2:30 PM
To: Rhodes, Dennis J.
Cc: Podesta, John; Kevin Borozan; Barlow, Marilee
Subject: RE: Bruno, et al v. Equifax Information Services

Dennis –

I'm available now.

From: Rhodes, Dennis J.
[<mailto:Dennis.Rhodes@wilsonelser.com>]
Sent: Tuesday, July 31, 2018 3:59 PM
To: Joseph Messer <jmesser@messerstrickler.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Kevin Borozan <kborozan@messerstrickler.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>
Subject: RE: Bruno, et al v. Equifax Information Services

I'll call you then. Thanks.

Dennis J. Rhodes
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<image004.jpg>

From: Joseph Messer
[mailto:jmesser@messerstrickler.com]
Sent: Tuesday, July 31, 2018 1:58 PM
To: Rhodes, Dennis J.
Cc: Podesta, John; Kevin Borozan; Barlow, Marilee
Subject: RE: Bruno, et al v. Equifax Information Services

Dennis –

I just left you a voicemail. I will be away from my phone until about 4:30CST but then back. If possible please give me a call then.

Joseph S. Messer, Esq.
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immediately by telephone, as well as delete it and any attachments. Thank you.

From: Rhodes, Dennis J.
[mailto:Dennis.Rhodes@wilsonelser.com]
Sent: Tuesday, July 31, 2018 12:25 PM
To: Joseph Messer <jmesser@messerstrickler.com>
Cc: Podesta, John <John.Podesta@wilsonelser.com>; Kevin Borozan <kborozan@messerstrickler.com>; Barlow, Marilee <Marilee.Barlow@wilsonelser.com>
Subject: RE: Bruno, et al v. Equifax Information Services

Yes, late this afternoon is best.

Dennis J. Rhodes
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415.434.1370 (Fax)
dennis.rhodes@wilsonelser.com

<image004.jpg>

From: Joseph Messer
[mailto:jmesser@messerstrickler.com]
Sent: Tuesday, July 31, 2018 4:51 AM
To: Rhodes, Dennis J.
Cc: Podesta, John; Kevin Borozan; Barlow, Marilee
Subject: Re: Bruno, et al v. Equifax Information Services

Dennis - Are you available for a call this afternoon?

Joseph Messer
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On Jul 30, 2018, at 5:11 PM, Rhodes, Dennis J.
<Dennis.Rhodes@wilsonelser.com> wrote:

Hi Joe,

Let's touch base tomorrow.

Thanks,
Dennis

Dennis J. Rhodes
Attorney at Law
Wilson Elser Moskowitz Edelman & Dicker LLP
525 Market Street - 17th Floor
San Francisco, CA 94105-2725
415.625.9295 (Direct)
415.433.0990 (Main)
415.434.1370 (Fax)
dennis.rhodes@wilsonelser.com

<image001.jpg>

From: Joseph Messer
[<mailto:jmesser@messerstrickler.com>]
Sent: Friday, July 20, 2018 2:16 PM
To: Rhodes, Dennis J.
Cc: Podesta, John; Kevin Borozan; Barlow, Marilee
Subject: RE: Bruno, et al v. Equifax Information Services

Dennis –

Since spoke on July 6 I have not heard back from you in response to my request for Mr. Bailey's cooperation in responding to Plaintiff's attached Subpoenas. Please let me know if Mr. Bailey is willing to cooperate. I believe the matter could be resolved if we could obtain the production of his correspondence from and to Equifax and Geneva Financial Services, as well as a declaration regarding the same and regarding his dealings with Equifax and Geneva Financial Services. Alternatively we will have no choice but to open a proceeding in Austin Texas to enforce the Subpoenas.

Please let us know if Mr. Bailey is willing to cooperate. As I will be out of the office next week in my absence please communicate with Mr. Borozan regarding the matter.

Thanks.

Joseph S. Messer, Esq.

Messer Strickler, Ltd.

a Professional Corporation

225 W. Washington, Suite 575

Chicago, IL 60606

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From: Joseph Messer
Sent: Friday, July 6, 2018 12:40 PM
To: 'Rhodes, Dennis J.'
<Dennis.Rhodes@wilsonelser.com>
Cc: Podesta, John
<John.Podesta@wilsonelser.com>; Kevin
Borozan <kborozan@messerstrickler.com>;
Barlow, Marilee
<Marilee.Barlow@wilsonelser.com>
Subject: RE: Bruno, et al v. Equifax
Information Services

Dennis –

Unfortunately I cannot do so because they have marked the documents as confidential pursuant to the Protective Order entered in the case.

Joseph S. Messer, Esq.
Messer Strickler, Ltd.
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From: Rhodes, Dennis J.
[mailto:Dennis.Rhodes@wilsonelser.com]
Sent: Friday, July 6, 2018 12:35 PM
To: Joseph Messer
<jmesser@messerstrickler.com>
Cc: Podesta, John
<John.Podesta@wilsonelser.com>; Kevin
Borozan <kborozan@messerstrickler.com>;
Barlow, Marilee
<Marilee.Barlow@wilsonelser.com>
Subject: RE: Bruno, et al v. Equifax
Information Services

Joe,

Thanks for the call. Would you send me
copies of what Equifax and McGinley
produced that references RMB?

Dennis

Dennis J. Rhodes
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dennis.rhodes@wilsonelser.com

<Image005.jpg>

From: Joseph Messer
[mailto:jmesser@messerstrickler.com]
Sent: Thursday, July 05, 2018 9:56 AM
To: Rhodes, Dennis J.
Cc: Podesta, John; Kevin Borozan; Barlow,
Marilee

Subject: RE: Bruno, et al v. Equifax
Information Services

Dennis –

That works. Talk to you at that time.

Joseph S. Messer, Esq.
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From: Rhodes, Dennis J.
[mailto:Dennis.Rhodes@wilsonelser.com]
Sent: Thursday, July 5, 2018 10:52 AM
To: Joseph Messer
<jmesser@messerstrickler.com>
Cc: Podesta, John
<John.Podesta@wilsonelser.com>; Kevin
Borozan <kborozan@messerstrickler.com>;
Barlow, Marilee
<Marilee.Barlow@wilsonelser.com>

Subject: RE: Bruno, et al v. Equifax
Information Services

Joe -

I am available tomorrow, Friday, in the morning. How about a 10 a.m. call, Pacific time?

Dennis

Dennis J. Rhodes
Attorney at Law
Wilson Elser Moskowitz Edelman & Dicker LLP
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415.433.0990 (Main)
415.434.1370 (Fax)
dennis.rhodes@wilsonelser.com

<image005.jpg>

From: Joseph Messer
[\[mailto:jmesser@messerstrickler.com\]](mailto:jmesser@messerstrickler.com)
Sent: Monday, July 02, 2018 2:53 PM
To: Rhodes, Dennis J.
Cc: Podesta, John; Kevin Borozan
Subject: Re: Bruno, et al v. Equifax
Information Services

Dennis -

I apologize for having been unable to connect last week. Please let me know when you would be available for a call.

Thanks.

Joseph S. Messer, Esq.
Messer Strickler, Ltd.
a Professional Corporation
225 W. Washington, Suite 575
Chicago, IL 60606
312-334-3440 Phone
312-334-3473 Fax

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From: Rhodes, Dennis J.
<Dennis.Rhodes@wilsonelser.com>
Sent: Thursday, June 28, 2018 10:53:31 AM
To: Joseph Messer
Cc: Podesta, John; Kevin Borozan
Subject: RE: Bruno, et al v. Equifax Information Services

Joe,

I am unavailable today, but let's plan to speak tomorrow morning around 10 a.m. my time.

Dennis J. Rhodes
Attorney at Law
Wilson Elser Moskowitz Edelman & Dicker LLP
525 Market Street - 17th Floor
San Francisco, CA 94105-2725
415.625.9295 (Direct)
415.433.0990 (Main)
415.434.1370 (Fax)
dennis.rhodes@wilsonelser.com

<image006.jpg>

From: Joseph Messer
[<mailto:jmesser@messerstrickler.com>]

Sent: Wednesday, June 27, 2018 2:43 PM
To: Rhodes, Dennis J.
Cc: Podesta, John; Kevin Borozan
Subject: RE: Bruno, et al v. Equifax
Information Services

Dennis –

Please let me know when you are available to discuss your attached letter and objections to the documents requested in Plaintiff's subpoena.

Also, we have not received documents from BB Direct in response to Plaintiff's subpoena. If I recall correctly your engagement for BB Direct was limited. Let me know if I should follow up with Brian Berg regarding the matter.

Thanks and I look forward to hearing back from you soon.

Joseph S. Messer, Esq.
Messer Strickler, Ltd.
a Professional Corporation
225 W. Washington, Suite 575
Chicago, IL 60606
312-334-3440 Phone
312-334-3473 Fax

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From: Barlow, Marilee
[mailto:Marilee.Barlow@wilsonelser.com]
Sent: Friday, June 15, 2018 6:54 PM
To: Joseph Messer
<jmesser@messerstrickler.com>
Cc: Rhodes, Dennis J.
<Dennis.Rhodes@wilsonelser.com>;
Podesta, John
<John.Podesta@wilsonelser.com>
Subject: Bruno, et al v. Equifax
Information Services

Dear Mr. Messer,

Please see the attached documents from John Podesta. Should you have any questions, please give our office a call.

Very truly yours,

Marilee Barlow
Legal Secretary
Wilson Elser Moskowitz Edelman & Dicker LLP
525 Market Street - 17th Floor
San Francisco, CA 94105-2725
415.625.9390 (Direct)
415.433.0990 (Main)
415.434.1370 (Fax)
marilee.barlow@wilsonelser.com

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Mail - afullett@messerstrickler.com

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